

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America)

v.)

Netsai MORENO-Suarez, Marco Antonio SALAZAR
Jr., Rigoberto GARDUZA Coy, Alma SERRANO,
Juan Angel MUNOZ-Molina, Soron WILLIAMS,
Rey THOMAS)

Case No. SA-22-MJ-00254

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 17, 2022 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section*8 U.S.C. § 1324 (a) (1)(A)(ii)
18 U.S.C. 371*Offense Description*

The defendant (s) did, knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transport and move and attempt to transport and move such alien(s) to wit: 14 undocumented aliens, within the United States, by means of transportation and otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet.JUAN F LOPEZ Digitally signed by JUAN F LOPEZ
Date: 2022.02.18 11:18:50 -06'00'*Complainant's signature*

Juan F. Lopez, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/17/2022*Judge's signature*City and state: San Antonio, Texas

Richard B. Farrer, U.S. Magistrate Judge

Printed name and title

Maximum term of imprisonment not to exceed 10 years, 3 years supervised released and \$250,000 fine.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Juan F. Lopez, duly sworn do hereby depose and state:

1. Your affiant is a Special Agent with Homeland Security Investigations (HSI) since August of 2006. Your affiant has participated in investigations concerning violations of Titles 8, 21, and 18.
2. On February 17, 2022, at approximately 4:30 pm, Homeland Security Investigations, Office of the Special Agent in Charge, San Antonio, Texas, (HSI San Antonio), received a call for assistance from the Bexar County Sheriff's Office (BCSO). BCSO had received a call from a concerned neighbor that a tractor-trailer was at the 11200 block of Briggs Rd., Atascosa, Texas 78002, in the Western District of Texas, and the neighbor had observed approximately 50 individuals exit the tractor trailer and go into a mobile home on the property. Soon after, BCSO Investigators arrived on the scene and observed unknown individuals at the location get into multiple vehicles and depart the Briggs Rd. location. BCSO Investigators conducted vehicle stops of four vehicles and the tractor-trailer seen departing the Briggs Rd location.
3. BCSO investigators conducted a traffic stop on a gray in color GMC Yukon after it departed the Briggs Rd. location. The driver, identified as **Rigoberto GARDUZA-COY**, a Mexican National with no documentation to be in the United States, absconded on foot but was later apprehended after a brief foot chase. BCSO Investigators observed three unknown individuals flee from the vehicle and escape through thick brush. A custodial interview of GARDUZA-COY was attempted but he declined to make a statement. Database queries conducted by HSI special agents revealed GARDUZA-COY was ordered removed by an immigration judge on 11/2/2020.
4. BCSO conducted a traffic stop on a gray in color GMC pickup truck after this truck departed the Briggs Rd. location. The driver, identified as **Juan Angel MUNOZ-Molina**, a Honduran National with no documentation to be in the United States, was transporting five Undocumented Aliens (UDAs) within the GMC truck he was driving. The five UDAs had no documentation to be in the United States. A custodial interview of MUNOZ-Molina was attempted but he declined to make a statement. Approximately \$3,900 of U.S. currency was discovered in MUNOZ-Molina's possession.
5. A grey Mazda sedan was stopped by BCSO Investigators after this Mazda was observed departing the Briggs Rd. location. The driver, identified as **Alma SERRANO**, a Mexican National with no documentation to be in the United States, was transporting five UDAs inside her Mazda sedan. The five UDAs had no documentation in their possession allowing them to be present in the U.S. legally. A custodial interview of SERRANO was

attempted but she declined to make a statement. Approximately \$450 dollars of U.S. currency was discovered in SERRANO's purse.

6. A grey Dodge Durango was stopped by BCSO Investigators. The driver, identified as **Marco Antonio SALAZAR Jr.**, a United States citizen, and front passenger, identified as **Netsai MORENO-Suarez**, a Mexican National with no documentation to be in the United States, were transporting four UDAs in their Dodge Durango. An additional search of the vehicle revealed approximately \$41,000 of U.S. currency discovered in MORENO-Suarez's purse.
7. A post-Miranda interview of SALAZAR was conducted after he agreed to speak with agents without the presence of an attorney. SALAZAR stated he was contacted by a female known only to him as "La Madrina" and asked to pick up four "illegals" from the Briggs Rd. location. SALAZAR admitted to agents he knew that the individuals he was transporting in his vehicle were illegally present in the United States and he was going to be paid \$150 per person he picked up. SALAZAR stated he was instructed to retrieve the large quantity of U.S. currency from inside a mobile home located at the Briggs Rd. location and deliver both the UDAs and the currency to an unknown location after being contacted by La Madrina. SALAZAR stated he knew what he was doing was wrong but he agreed to transport the UDAs for financial gain. SALAZAR informed agents he had previously been arrested by U.S. law enforcement for violations of alien smuggling. Database records revealed SALAZAR was arrested by U.S. Border Patrol agents in 2009 for alien smuggling.
8. A post-Miranda interview of MORENO-Suarez was conducted after she agreed to speak to agents without the presence of an attorney. MORENO-Suarez stated she was contacted by an individual named Maria Rodriguez and asked to pick up four UDAs from the Briggs Rd. location. MORENO-Suarez admitted she knew the individuals she was picking up were illegally present in the United States. MORENO-Suarez stated Maria Rodriguez was going to pay her for picking up the four UDAs but MORENO-Suarez did not recall the amount she was going to be paid. MORENO-Suarez stated that, after picking up the UDAs from the location, she was going to drop off the four UDAs to a pre-determined location provided to her by Maria Rodriguez. Maria Rodriguez also told MORENO-Suarez she would be told where to turn over the large quantity of U.S. currency discovered in her purse by agents. MORENO-Suarez admitted to agents she and SALAZAR arrived to the Briggs Rd. location prior to the tractor trailer arriving. MORENO-Suarez added, she and SALAZAR entered a mobile home located at this Briggs Rd. location and picked up the large amount of U.S. currency that was located near the sliding door of the mobile home. MORENO-Suarez told agents she was aware the UDAs were transported to the Briggs Rd. location in a tractor trailer because she saw the tractor trailer arrive and observed the UDAs exit the tractor and enter the mobile home. MORENO-Suarez believed the UDAs were transported inside the tractor. MORENO-Suarez explained to agents, SALAZAR climbed into the tractor to find out how the UDAs were loaded into the tractor because SALAZAR had observed a female UDA covered in sweat upon arriving. MORENO-Suarez told agents she, too, was

illegally present in the U.S. and had no proper documentation allowing her to be present in the U.S.

9. **Soron WILLIAMS** was identified as the driver of the tractor trailer that dropped off UDAs at the Briggs Rd. location. A post-Miranda interview was conducted with WILLIAMS after he agreed to speak to agents without the presence of an attorney. WILLIAMS stated he and his passenger, Rey THOMAS, picked up what he believed to be 40 UDAs in Laredo, Texas, for which he was going to be paid \$72,500 dollars. WILLIAMS stated that after the UDAs were loaded into his trailer in Laredo, he was escorted back to the Briggs Rd. location in San Antonio by both SALAZAR and MORENO-Suarez in a gray Dodge Durango. WILLIAMS claimed this was the second time he has transported UDAs.
10. **Rey THOMAS** was identified as a passenger in the tractor trailer that dropped off UDAs at the Briggs Rd. location. A post-Miranda interview of Rey THOMAS was conducted after he agreed to speak to agents without the presence of an attorney. THOMAS stated he picked up UDAs in Laredo, Texas, earlier in the day. THOMAS stated this was the second time he has transported UDAs. THOMAS stated the first time he and WILLIAMS transported UDAs, he and WILLIAMS were each paid \$15,000 thousand dollars by MORENO-Suarez to smuggle UDAs.

Based on the above facts, your affiant believes there is probable cause that Rigoberto GARDUZA-Coy, Juan Angel MUNOZ-Molina, Alma SERRANO, Marcos Antonio SALAZAR Jr., Netsai MORENO-Suarez, Soron WILLIAMS, and Rey THOMAS did conspire together to violate 8 U.S.C. § 1324 (a)(1)(A)(ii).

JUAN F
LOPEZ

Digitally signed by JUAN
F LOPEZ
Date: 2022.02.18
11:19 36 -06'00'

Juan F. Lopez
Special Agent

Sworn to before me and signed in my presence.

Date: 02/18/2022



Richard B. Farrer, US Magistrate Judge